

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

LINDA SUN,

a/k/a “Wen Sun,” “Ling Da Sun,” and
“Linda Hu,” and

CHRIS HU,

Defendants.

24 Cr. 346 (BMC)

JURY QUESTIONNAIRE

In addition to its usual questions and in advance of *voir dire*, the Court shall ask the following questions of potential jurors prior to them being empaneled for jury selection:

1. Please provide the following information:
 - a. Name?
 - b. Age?
 - c. Gender?
 - d. Place of birth?
2. What is your current marital or relationship status?
3. Where were you raised?
4. Where do you live currently?
5. How long have you lived at your current residence?
6. Do you live in your home with any other people?
 - a. If so, whom?
7. Have you ever lived in another country?
 - a. If so, where and when?

8. Have you ever traveled outside the United States?
 - a. If so, where and when?
9. Did you earn a degree after high school?
 - a. If so, what was your major?
10. Do you have any post-graduate degrees?
 - a. If so, what are they?
11. What is the highest level of education you have completed?
12. What is your occupation (or prior occupation if retired or unemployed)?
 - a. Who is your employer (or prior employer if retired or unemployed)?
 - b. Do or did you supervise others in your job?
13. If you are married or live with someone, what is that person's occupation and who is his or her employer?
14. Do you have any children?
 - a. If so, how many and what age(s)?
 - b. If you have grown children, what are their occupations and who are their employers?
15. What television shows do you typically watch?
16. What newspapers do you typically read?
17. What is your typical source of news or updates on noteworthy events?
18. How often or closely do you follow the news?
19. Do you belong to or volunteer your time at any associations, organizations, clubs, or unions?
20. What do you like to do in your spare time?

21. Have you ever had prior jury service?
 - a. If so, were you a trial juror or part of a grand jury?
 - b. Was it a state or federal case?
 - c. Was it civil or criminal case?
 - d. Did the jury reach a verdict, without telling us what it was?
 - e. Is there anything about your prior jury experience that would prevent you from being fair and impartial in this case? If so, please explain.
22. Have you, a family member, or close friend ever been involved in a civil lawsuit?
 - a. If so, what was the nature of the lawsuit?
 - b. What was the result?
23. Have you or an immediate family member ever served in the military (including the reserves, National Guard, or ROTC)?
 - a. If yes, please indicate who and the branch of service, highest rank, dates of service, foreign stations or tours, type of discharge, duties and any special training or honors received.
24. Do you speak any foreign languages?
 - a. If yes, which language(s)?
 - b. Would you have any difficulty relying solely on an interpreter's English translation during court proceedings, even if you speak or read the language other than English?
25. Do you have difficulty reading, understanding, or speaking English?
26. Do you have any condition or issue that would affect your ability to serve as a juror, including difficulty hearing, seeing, reading, sitting or concentrating for long periods of time?
 - a. If so, please describe.
27. Have you or anyone you know ever worked for the United States in any capacity?

28. Have you or anyone you know ever worked for the State of New York in any capacity?

29. Have you or anyone you know ever worked for a foreign government in any capacity?

30. Have you or anyone you know ever participated, in any way, with any organizations that work on issues related to pro-democracy reforms in other countries?

31. Have you ever heard of the Foreign Agents Registration Act?

32. Do you have any strong opinions about foreign countries spending money to influence the outcome of U.S. elections or to seek political favors from U.S. elected officials?

33. Do you have any strong opinions or views about the People's Republic of China ("PRC")?

34. Have you or anyone you know ever participated, in any way, with any organizations that work on issues regarding the PRC?

35. Do you, your relatives, or your close friends have any connection to the PRC or its government?

36. Do you have any strong opinions or views toward Taiwan or its policies?

37. Have you or anyone you know ever participated, in any way, with any organizations that work on issues regarding Taiwan?

38. Do you, your relatives, or your close friends have any connection to Taiwan or its government?

39. Have you ever heard of the ethnic group in the PRC known as the Uyghurs?

40. Have you or anyone you know ever participated, in any way, with any organizations that work on issues related to the Uyghur people?

41. In this case, one of the defendants is accused of acting as an agent on behalf of PRC without registering with the Attorney General of the United States.

a. Do you have any opinions or views regarding the PRC that would prevent you from being impartial and rendering a determination based solely on evidence presented in this case?

b. Do you have any opinions or views about the relationship between the United States and the PRC that would prevent you from being impartial and rendering a determination based solely on evidence presented in this case?

42. Do you have any opinions or views about individuals of Chinese origin that could impact your ability to be impartial and render a determination based solely on evidence presented in this case?

43. Do you have any personal or professional connections to individuals or organizations based in the PRC?

44. Do you have any opinions or views about individuals accused of crimes related to national security?

45. Do you believe that individuals accused of crimes related to national security or espionage should be entitled to the same presumption of innocence as anyone else?

46. Information during this trial may concern certain political figures in New York. Do you have any opinions or views regarding politicians that would prevent you from being impartial and rendering a determination based solely on evidence presented in this case?

a. If so, please describe.

47. Do you have any opinions or views about Andrew Cuomo or people who may have worked in his administration?

48. Do you have any opinions or views about Kathy Hochul or people who may have worked in her administration?

49. Have you ever run for or held a political office?

50. Do you consider yourself (a) very interested in New York politics; (b) somewhat interested in New York politics; or (c) slightly or not at all interested in New York politics?

51. Do you consider yourself (a) very interested in U.S. foreign relations; (b) somewhat interested in U.S. foreign relations; or (c) slightly or not at all interested in U.S. foreign relations?

52. Is there anything about the nature of this case, including the fact that it involves accusations of bribery and corruption by an elected official and others, that would make it difficult for you to be a fair and impartial juror?

53. Have you, a family member, or anyone close to you ever been employed, volunteered or had any other affiliation with any aspect of criminal prosecutions or criminal defense work (or applied or planned to apply to do so)?

a. If yes, please indicate who, the area of law, type of work/experience, dates, and location.

54. Do you have any opinions about prosecutors or criminal defense attorneys?

a. If yes, please describe.

55. Have you, or any close friend or relative, ever worked in law enforcement (*e.g.*, as a police officer, security guard, corrections officer in a jail or prison, or prosecutor in a local, state, or federal prosecutor's office)?

56. Do you know or have any association with anyone who works for the United States Attorney's Office for the Eastern District of New York, Federal Bureau of Investigation, or the Internal Revenue Service?

- a. If so, please identify who and where they work.
- b. Have you ever discussed the nature of their work?
- c. If so, generally what have you discussed?

57. Have you had any contact with anyone in law, law enforcement, the justice system, or the courts that might influence your ability to evaluate this case in any way?

58. Have you or any member of your immediate family ever been stopped, questioned, investigated, arrested, prosecuted, or convicted of a crime (other than a traffic ticket) by any law enforcement officer or agency?

- a. If so, what were the circumstances and what was your reaction?
- b. Is there anything about that experience that would impact your ability to be fair and impartial in this case?

59. Do you have, or have you ever had, a close friend or family member in prison? If so, please explain.

60. You will be instructed that although defendants have been indicted in this case, the indictment is no evidence of guilt whatsoever and you may not consider the fact that they have been indicted as bearing on their guilt or innocence. Would you be able to follow that instruction?

61. Do you have any opinions or beliefs concerning the criminal justice system that would affect your ability to be a fair and impartial juror?

62. Have you, or any close friend or relative, ever been involved in any court proceeding, a grand jury proceeding, or any other legal proceeding as a plaintiff, defendant, victim, or witness?

63. Have you, or any close friend or relative, ever had any legal action or dispute with the federal government, any state or local government, or any of their agencies, officers, agents,

or employees?

64. Have you, or any close friend or relative, ever filed a complaint with the police against anyone?

65. Do you have any opinions or beliefs concerning law enforcement in general—including the Department of Justice, the Federal Bureau of Investigation, or the Internal Revenue Service—that would affect your ability to be a fair and impartial juror?

66. The witnesses in this case may include law enforcement officers. You will be instructed that you should evaluate their credibility the same way you would any other witness, without giving them more or less credit just because they are a law enforcement witness. Would you be able to follow that instruction?

67. You will be instructed that the defendants are presumed to be innocent of any and all crimes throughout the course of this trial, unless and until the Government proves their guilt beyond a reasonable doubt. Would you be able to follow that instruction?

68. You will be instructed that the burden of proving guilt rests entirely with the government and no defendant ever has any obligation to prove his or her innocence. Will you be able to follow that instruction?

69. You will be instructed that under the law, a defendant is never required to testify or offer any evidence on his or her behalf, and that if a defendant chooses not to testify, the jury is not permitted to consider that fact in any way in reaching a decision as to whether a defendant is guilty or not guilty. Will you be able to follow that instruction?

70. Have you seen or heard about any press releases related to this case?

71. Have you seen or heard any media coverage of this case?

72. Have you, at any time, read, seen, heard, discussed, written or communicated anything about this case, or anyone connected to the case, in the newspapers, on television, through

the Internet, on social media, while listening to the radio, talking with other people or through any other source?

73. This case may receive media attention. The Court will instruct you that it is part of the oath you will take that you cannot watch television, go on the Internet, including Facebook, Twitter, Instagram or blogs, and/or listen to or watch any media coverage regarding this case, that you are not to discuss the case with family or friends until the trial and your deliberations have concluded, that you are not to discuss the case with fellow jurors until time for deliberations, and that the only information you are permitted to consider is what is presented in court. Will you be able to follow that instruction?

74. At the conclusion of the case the Court will charge you on the law and explain to you the elements of the crimes charged in the indictment. Do you have personal, religious, philosophical or other beliefs as to what the law is or should be that would make it difficult for you to follow the instructions of the Court or that would make it difficult for you to decide the defendants' guilt or innocence based on the evidence presented?

75. Under the law, the facts are for the jury to determine and the law is for the judge to determine. You will be instructed that you are required to accept the law as the judge explains it to you, even if you do not like the law or disagree with it, and you must determine the facts according to those instructions. Will you be able to follow this instruction?

76. Do you know of any reason whatsoever why you could not, or should not, serve as a juror in this case?

77. The Court and parties estimate that after a jury is selected, this case will last approximately three weeks, with the Court sitting Monday through Thursday, starting no sooner than November 3, 2025. Is there anything about service on this jury that would cause you undue hardship?